

Date: August 26, 2025

Kevin: Realworldfare, *sui juris*

Corey: Walker, *sui juris*

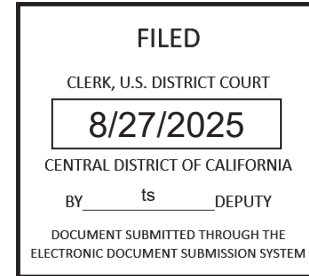
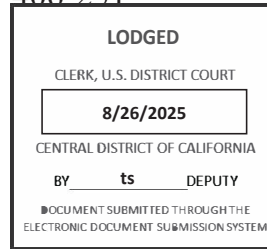
Care of: 30650 Rancho California Road # 406-251

Temecula, California [92591]

non-domestic without the United States

Email: team@walkernovagroup.com

***Real Party In Interest, Injured Party,
Secured Party, Plaintiff***



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Kevin: Realworldfare, Corey: Walker
Plaintiffs/Real Parties In Interest,
vs.

**Tamara Lucile Wagner, Kai Fan, DOES
1-10,**
Defendants.

Case No. 5:25-cv-01330

**VERIFIED SUPPLEMENTAL NOTICE
OF PERFECTED SERVICE AND
FILING OF VERIFIED DECLARATION
OF DUE DILIGENCE DECLARATION
BY WILLIAM SERA (RETIRED LAPD
DETECTIVE)**

**(SPECIAL LIMITED APPEARANCE —
IN EQUITY ONLY — EQUITY
JURISDICTION PRESERVED)**

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

This matter is brought in **equity**, under the original and exclusive jurisdiction of this Court as authorized by **Article III, Section 2** of the Constitution of the United States. All statutory jurisdiction is expressly denied and rebutted. This is a Court of Record. All rights are reserved without prejudice pursuant to UCC 1-308.

COMES NOW **Kevin: Realworldfare and Corey: Walker**, each a **natural, living man** on the **land and soil** of the ***De’Jure* Republic**, each **one of the People** of the united states of America, and each a **Real Party in Interest, Plaintiff, and Injured Party** in this matter. Kevin and Corey proceed *sui juris*, by ***specially limited appearing only*** in **proper private capacity**, **not** as a 14th Amendment U.S. citizen, **not** as a corporate “person,” **not** pro se,

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1 **not** pro per, not as a “resident,” and **not** through any fictitious legal construct — but each as
2 **one of the people, a Plaintiff, Real Party in Interest, Secured Party, and Creditor,**
3 standing on the land and soil jurisdiction of the **De Jure Texas and/or California Republic,**
4 without adhesion, contract, or submission to any foreign corporate entity posing as
5 government.

6 Real Parties In Interest/Plaintiffs invoke this Court’s **original jurisdiction in equity**, as
7 vested under **Article III of the Constitution for the United States of America**, and
8 demand adjudication according to the facts, truth, common law, and applicable equity
9 principles. The People’s inherent rights are secured and guaranteed by the **Bill of Rights** —
10 including the First Amendment right to petition for redress of grievances, the Fourth and
11 Fifth Amendment protections against unlawful seizure and deprivation of property without
12 due process, the Seventh Amendment guarantee of trial by jury in suits at common law, and
13 the Ninth and Tenth Amendments reserving rights and powers to the People themselves.

14 Accordingly, this Court sits in **equity alone**. There exists no plain, speedy, or adequate
15 remedy at law. Plaintiffs have been robbed of their private trust property, dispossessed
16 without lawful jurisdiction, denied due process of law under both the Constitution and the
17 Bill of Rights, and obstructed from every statutory and equitable avenue of redress. In such
18 circumstances, **common law and equity compel relief**: *Equity regards that as done which*
19 *ought to be done, and Equity will not suffer a wrong to be without a remedy.*

20 The law provides no substitute. The statutes are exhausted, the remedies at law are
21 illusory, and the fraud perpetrated under color of law can only be corrected by equity.
22 As the Supreme Court has long held, “*Equity will not suffer a wrong without a*
23 *remedy*” (*Marbury v. Madison*, 5 U.S. 137 (1803)); and where law fails, “*equity steps*
24 *in to do justice.*”

25 Thus, this Court has **exclusive, unavoidable jurisdiction in equity** to restore possession,
26 quiet title, vacate void acts, and grant full restitution. Any refusal to act would not merely
27 deny justice — it would ratify theft, fraud, and treason under color of law.

28 Equity alone remains. **There is no alternate avenue.**

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1 Real Party in Interest and Plaintiff, and respectfully submits this
2 **Supplemental Verified Notice of Perfected Service**, incorporating into the
3 record the **Verified Verified Declaration of Due Diligence of William**
4 **Sera** (Attached hereto as **Exhibit BB**) concerning service of summons and
5 complaint, **out of abundance of caution only**. This filing obliterates any
6 fabricated claim of “failure to serve” and proves that Defendants were duly
7 noticed, waived formal service, and now stand in default.

8 **I. INTRODUCTION**

9 This case record already establishes sworn, **unrebutted verified** affidavits
10 (Exhibits E–H) memorializing Defendants’ waiver of service by USPS **and/or**
11 electronic means. The due diligence declaration now confirms repeated in-
12 person attempts, direct contact with Defendant Kai Fan, and his willful refusal
13 to accept legal documents.

14 **Service is therefore perfected as a matter of law, equity, and contract.**
15 **Defendants’ evasion and silence do not undo service — they confirm it.**

16 **II. DECLARATION OF DUE DILIGENCE**

17 The attached sworn declaration proves:

- 18 **1. Multiple diligent attempts** at personal service on Defendant Kai Fan
19 at multiple addresses, dates, and times. This satisfies “reasonable
20 diligence” under California Code of Civil Procedure §§ 415.20–415.30,
21 made applicable by Fed. R. Civ. P. 4(e)(1).
- 22 **2. Direct acknowledgment by Defendant Kai Fan**, who was contacted
23 and expressly told the papers were legal documents, but intentionally refused
24 acceptance. Courts are clear: refusal to accept service is legally ineffective.
25 *Nikwei v. Ross School of Aviation, Inc.*, 822 F.2d 939, 945 (10th Cir. 1987) (“A
26 defendant cannot defeat service by refusing to accept the papers.”).
- 27 **3. Electronic service** transmitted to the exact email addresses Defendant
28 himself provided (kevinyin520@gmail.com and enhancaolaw@gmail.com),

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1 authorized under Fed. R. Civ. P. 5(b)(2)(E). Transmission with consent
2 constitutes constructive receipt.

3 **4. Service upon Defendant Tamara Wagner** by USPS **Certified and**
4 **Registered** mail, with notice of every filing in this case delivered to her
5 as a State judicial officer. Her silence constitutes dishonor, default, and
6 tacit ratification. Under the maxim “**notice to the agent is notice to**
7 **the principal**,” her acceptance and silence bind not only herself but also
8 the State of California.

9 III. CASE LAW SUPPORT

10 **1. Service by Mail Constitutes Valid Service Where Authorized or** 11 **Consented**

- 12 • *Ackermann v. Levine*, 788 F.2d 830, 839 (2d Cir. 1986): service by mail is
13 proper where the defendant has actual notice and does not contest.
- 14 • *Mennonite Bd. of Missions v. Adams*, 462 U.S. 791, 800 (1983): due
15 process is satisfied where notice is “reasonably calculated” to reach the
16 party. Certified mail suffices.
- 17 • *Greene v. Lindsey*, 456 U.S. 444, 455 (1982): mailing notice is
18 constitutionally sufficient when it reasonably ensures delivery.

19 **2. Silence and Failure to Rebut = Admission, Default, and Acquiescence**

- 20 • *United States v. Kis*, 658 F.2d 526, 536 (7th Cir. 1981): “Unrebutted
21 affidavits stand as truth in law.”
- 22 • *Thompson v. Whitman*, 85 U.S. (18 Wall.) 457, 469 (1873): judgments
23 entered without jurisdiction or where notice is ignored are void.
- 24 • *Carmin v. Bowen*, 64 A. 932, 934 (Pa. 1906): “Silence is admission, where
25 the circumstances impose a duty to speak.”

26 **3. Notice to Agent = Notice to Principal**

- 27 • *Link v. Wabash R.R. Co.*, 370 U.S. 626, 634 (1962): notice to a party’s
28 attorney (agent) is notice to the party (principal).

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- *Bowen v. City of New York*, 476 U.S. 467, 480 (1986): agency principles impute knowledge from agent to principal.
- *Restatement (Third) of Agency* § 5.03: “Notice of a fact that an agent knows or has reason to know is imputed to the principal.”

4. Judicial Officers Acting as Agents of the State

- *Ex parte Virginia*, 100 U.S. 339, 347 (1880): state judicial officers act as officers of the State, and their acts are the State’s acts.
- *O’Donoghue v. United States*, 289 U.S. 516, 530 (1933): judges derive their authority from the sovereign, and their misconduct implicates the sovereign.

IV. LEGAL EFFECT AND EQUITY JURISDICTION

- Under **United States v. Kis**, 658 F.2d 526, 536 (7th Cir. 1981), un rebutted affidavits stand as truth in law.
- Under **Mullane v. Central Hanover Bank**, 339 U.S. 306 (1950), due process requires only notice “reasonably calculated” to inform — a standard far exceeded here.
- Under **Payne v. Hook**, 74 U.S. 425, 430 (1868), **equity jurisdiction is inherent, not dependent on statute. Substance controls over form, and equity abhors forfeiture.**
- Under **Article I, Section 10 of the U.S. Constitution**, contracts cannot be impaired. The sworn un rebutted affidavits fixing waiver of service are binding contracts in equity and law.
- Under **Nikwei v. Ross School of Aviation, Inc.**, *supra*, and **Gottlieb v. Sandia Am. Corp.**, 452 F.2d 510, 513 (3d Cir. 1971), a defendant cannot evade jurisdiction by ducking service. Evasion confirms default.

Thus, Defendants’ actual notice, refusal, waiver, and silence perfect service. Any contrary claim is fraud on the court.

V. DEMAND AND NOTICE

Plaintiffs/Real Parties in Interest hereby give notice:

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- 1 **1. Service is perfected** by waiver, consent, due diligence, mailing, email, and
2 direct contact.
- 3 **2. Defendants are in default** by dishonor, silence, and evasion.
- 4 **3. Jurisdiction is fixed.** The Court is estopped from manufacturing the false
5 narrative of “failure to serve.”
- 6 **4. The Declaration of Due Diligence is incorporated as Exhibit ____** into the
7 record of service.
- 8 **5. Any further reliance on a fabricated “service defect” constitutes fraud on the**
9 court, obstruction of justice, and simulated legal process under color of law.

10 **VI. CONCLUSION**

11 The record admits of no ambiguity and forecloses all argument: **service is perfected**
12 **at law, in equity, and by binding contract.** Defendants were duly noticed, waived
13 formal service, and then compounded their dishonor by silence, acquiescence, and
14 deliberate evasion. In law and in equity, such conduct does not defeat service — it
15 confirms default.

16 To persist in the manufactured lie of “failure to serve” is not adjudication; it is willful
17 fraud on the court, collusion with dishonored parties, and the continuation of a
18 simulated legal process under color of law. No amount of judicial invention, procedural
19 trickery, or magistrate usurpation can erase sworn un rebutted affidavits, perfected
20 waiver agreements, or binding constitutional contracts.

21 **Defendants stand in default. Jurisdiction is fixed. Service is sealed.** Any
22 further attempt to deny these truths is not the act of a neutral tribunal but an act of
23 obstruction, racketeering, and treason to the Constitution itself.

24 //

25 //

26 //

27 //

28 //

Date: August 26, 2025

VERIFICATION:

Pursuant to **28 U.S.C. § 1746**

I, Kevin: Realworldfare, over the age of 18, competent to testify, and having **firsthand knowledge** of the facts stated herein, do hereby **declare, certify, verify, affirm, and state** under penalty of perjury under the laws of the **United States of America**, that the foregoing statements are **true, correct, and complete**, to the best of my **understanding, knowledge, and belief**, and made in **good faith**.

Executed, signed, and sealed this 26th day of August in the year of Our Lord two thousand and twenty five, *without* the United States.

All rights reserved without prejudice or recourse, UCC § 1-308, 3-402.

By: _____

Kevin: Realworldfare
Kevin: Realworldfare, Real Party In Interest,
Plaintiff, Secured Party, Injured Party

VERIFICATION:

Pursuant to **28 U.S.C. § 1746**

I, Corey: Walker, over the age of 18, competent to testify, and having **firsthand knowledge** of the facts stated herein, do hereby **declare, certify, verify, affirm, and state** under penalty of perjury under the laws of the **United States of America**, that the foregoing statements are **true, correct, and complete**, to the best of my **understanding, knowledge, and belief**, and made in **good faith**.

Executed, signed, and sealed this 26th day of August in the year of Our Lord two thousand and twenty five, *without* the United States.

All rights reserved without prejudice or recourse, UCC § 1-308, 3-402.

By: _____

Corey Walker
Corey: Walker, Real Party In Interest,
Plaintiff, Secured Party, Injured Party

//

//

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LIST OF EXHIBITS / EVIDENCE:

1. **Exhibit A:** Affidavit: Power of 'Attorney-in-Fact'
2. **Exhibit B:** UCC1 filing #2024385942-1.
3. **Exhibit C:** UCC3 filing #2024425487-2.
4. **Exhibit D:** GRANT DEED recorded in Official Records County of Riverside, DOC #2024-0036701, APN: 270-400-037, File No.: 35198 CM, where the private property is titled to 'New Beginnings Trust, dated January 1, 2024'
5. **Exhibit E:** Affidavit and **Contract** and Security Agreement #RF775823194US.
6. **Exhibit F:** Affidavit and **Contract** and Security Agreement #RF775820683US.
7. **Exhibit G:** Affidavit and **Contract** and Security Agreement #RF775823163US.
8. **Exhibit H:** **Contract** and Security Agreement / **Affidavit Certificate** of Dishonor, Non-response, **DEFAULT**, **JUDGEMENT**, and **LIEN AUTHORIZATION** and **LIEN AUTHORIZATION**, #RF775824075US.
9. **Exhibit I:** Form 3811 corresponding to Exhibit L.
10. **Exhibit J:** Form 3811 corresponding to Exhibit N.
11. **Exhibit K:** Form 3811 corresponding to Exhibit P.
12. **Exhibit L:** Form 3811 corresponding to Exhibit R.
13. **Exhibit M:** Exhibit U: INVOICE/TRUE BILL #ENHANKAIDISHONOR25.
14. **Exhibit N:** Copy of **fraudulent, coercive, extortionate**, OFFER titled "THREE-DAY NOTICE TO QUITE DUE TO FORECLOSURE"
1. **Exhibit O:** Defendants' VERIFIED Response and **Demand** for Dismissal of **Fraudulent Unlawful Detainer AND SANCTIONS AGAINST PLAINTIFFS** and **Demand** FOR CONSIDERED AND STIPULATED **JUDGEMENT**, and **Demand** FOR QUIET TITLE AND **Demand** for Summary Judgement in Favor of Defendants, as a matter of law (received by the Court on, **April 7, 2025**, by way or **Registered Mail** #RF775824570US).
2. **Exhibit P:** Form 3811 evidencing deliver of **Exhibit O**.
3. **Exhibit Q:** California State Bar License Verification – Tamara Lucile Wagner (Bar No. 188613)

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- 1 4. **Exhibit R:** Verified Complaint to Quiet Title (Case No. CVR12502206), filed **May 6,**
2 **2025**, in the Superior Court of California, County of Riverside, concerning real property
3 located at 12232 Brianwood Drive, Riverside, CA (APN: 270-400-037)
- 4 5. **Exhibit S:** VERIFIED EMERGENCY NOTICE AND DEMAND FOR IMMEDIATE
5 STAY OF **UNLAWFUL PROCEEDINGS**; NOTICE OF **JUDICIAL FRAUD** AND
6 **RAILROADING**; AND DEMAND FOR ENFORCEMENT OF CONSIDERED AND
7 UNDISPUTED SUMMARY JUDGMENT AS A *MATTER OF LAW*, filed April 24, 205.
- 8 6. **Exhibit T:** Transcribed voicemail from court clerk "Christine," dated April 28, 2025,
9 confirming that the May 1, 2025, "prove-up hearing" would proceed at the direction of
10 Defendant Tamara L. Wagner, despite the state court having been divested of
11 jurisdiction by federal removal on April 28, 2025.
- 12 7. **Exhibit U:** Verified **Emergency** Motion AND DEMAND to Dismiss Unlawful Detainer
13 for **Lack of Jurisdiction**, Stay Execution of Writ of Possession, and Request for
14 **Temporary Restraining Order** Pending Resolution of Quiet Title Action (Case No.
15 CVR12502206)
- 16 15.**Exhibit V:** Verified Notice of Appeal – Filed May 23, 2025
- 17 16.**Exhibit W:** Verified Notice of Stay – Filed May 23, 2025
- 18 17.**Exhibit X:** Verified Declaration of Corey: Walker in lieu of reporter's transcript and in
19 support of writ of supersedes, (Summarizing Proceedings, Court Rulings, and Motion
20 to Dismiss and Stay in Trial Court).
- 21 18.**Exhibit Y:** VERIFIED EMERGENCY EX PARTE MOTION AND DEMAND TO STAY
22 WRIT OF POSSESSION PENDING APPEAL and Resolution of Quiet Title Action (Case
23 No. CVR12502206)
- 24 19.**Exhibit Z:** Trial court docket showing removal to federal court on April 28, 2025, and
25 remand received on May 5, 2025.
- 26 20.**Exhibit AA:** Proof of electronic Email Service to Kai Fan as stipulated and agreed to by
27 Kai Fan via Exhibits E through L.
- 28 21.**Exhibit BB:** Declaration of Due Diligence of William Sera regarding service

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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF RIVERSIDE)

I competent, over the age of eighteen years, and not a party to the within action. My mailing address is the Walkernova Group, **care of:** 30650 Rancho California Road suite #406-251, Temecula, California [92591]. On or about **August 26, 2025**, I served the within documents:

**1. VERIFIED SUPPLEMENTAL NOTICE OF PERFECTED SERVICE AND
FILING OF VERIFIED DECLARATION OF DUE DILIGENCE
DECLARATION BY WILLIAM SERA (RETIRED LAPD DETECTIVE)**

2. Exhibit BB

By United States Mail. I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed below by placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepared. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Riverside County, California, and sent via Registered Mail with a form 3811.

Tamara-Lucile: Wagner (#188613)
C/o TAMARA WAGNER
505 South Buena Vista,
Corona, California [92882]
Certified Mail #9589071052702295084694

Kai: Fan
C/o KAI FAN
3426 Vineland Avenue
Baldwin Park, California [91706]

Kai: Fan
C/o KAI FAN

Date: August 26, 2025

12220 Casper Court
Rancho Cucamonga, California [91739]

By Electronic Service. Based on a court order and/or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below.

Kai: Fan
C/o KAI FAN
3426 Vineland Avenue
kevin520@gmail.com
enhancalaw@gmail.com

Kai: Fan
C/o KAI FAN
12220 Casper Court
kevin520@gmail.com
enhancalaw@gmail.com

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **August 26, 2025** in Riverside County, California.

/s/Chris Yarbra/
Chris Yarbra

-Exhibit BB-

1 William Sera (Los Angeles County, RPS No. 2016163195)
2 **MY INVESTIGATIVE SERVICES, INC.**
3 136 N. Grand Ave., Suite 115
4 West Covina, CA 91791
5 Phone: (213) 342-1802
6 ws@myinvestigativeservices.com

7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 **Kevin: Realworldfare, Corey: Walker**
10 *Plaintiffs/Real Parties In Interest,*
11 *vs.*

12 **Tamara Lucile Wagner, Kai Fan, DOES**
13 **1–10,**
14 *Defendants.*

Case No. 5:25-cv-01330

**VERIFIED DECLARATION OF DUE
DILIGENCE OF WILLIAM SERA —
RE: SERVICE OF SUMMONS AND
COMPLAINT, UNITED STATES
DISTRICT COURT OF CALIFORNIA**

15
16
17 **I, WILLIAM SERA, over the age of 18, competent to testify, and having firsthand**
18 **knowledge of the facts stated herein, do hereby declare, certify, verify, affirm,**
19 **and state under penalty of perjury under the laws of the United States of America,**
20 **that the foregoing statements are true, correct, and complete, to the best of my**
21 **understanding, knowledge, and belief, and made in good faith, and if called,**
22 **could and would competently testify thereto:**

- 23 1. I am over the age of eighteen years old and not a party to this action.
24 2. The facts set forth herein are true and correct as of our own personal knowledge.
25 3. I am a California Registered Process Server.
26 4. I, William Sera, am duly registered in Los Angeles County with ID # 2016163195.
27 5. On June 6, 2025, we were contracted to serve legal documents to Mr. Kai Fan,
28 individually, in two cases: one from the California Court in Riverside and a second

1 from the United States District Court of California. We were given the address of
2 12220 Casper Court, Rancho Cucamonga, CA 91739. It is an HOA-gated
3 community with restricted access. There is no one mandating the gate; we had to
4 make sure we waited to gain access to attempt to enter every time I went to the
5 community property. Below are the listed dates and times when we made attempts
6 to serve the legal documents:

7 1) Sunday, June 8, 2025, at 4:23 p.m. (weekend attempt)

8 a. The daughter of Mr. Fan answered and stated he was at work. I provided
9 a business card for him to contact the firm and arrange a meeting at his
10 convenience, as he is always busy.

11 2) Monday, June 9, 2025, 9:43 a.m. (weekday attempt)

12 a. Chat with Kai Fan (626) 418-4321) Good morning, Mr. Fan, I am the
13 process server who came by your house to deliver legal documents to you.
14 I spoke to your daughter, and I provided a business card, and I
15 understood that you were working. Can you either text me or call me so I
16 can arrange a time to meet you somewhere, bring it to you, or come to
17 your house? Please let me know. Thank you!

18 3) Monday, June 9, 2025, 9:47 a.m. (weekday attempt)

19 a. I called (626) 418-4321 and explained after the text, and he heard me.
20 Then, he stated he didn't understand English and hung up.

21 4) Wednesday, June 11, 2025, 11:09 a.m. (weekday attempt)

22 a. I knocked and left a business card, and there were no answer and no
23 response.

24 5) Monday, June 16, 2025, 3:13 p.m. (weekday attempt)

25 a. Digital Service: Sent Email: Details

26 Sent to Kai Fan

27 Email kevinyin520@gmail.com Resend Email

28 Subject: Digital Service Documents for Kevin Realworldfare v. Kai Fan

1 Sent on June 16, 2025, 03:13:14 PM

2 Message,

3 Mr. Fan, we have made several attempts to visit your residence, spoken
4 to your daughter, and provided you with our business card. You returned
5 the call. However, when we tried to serve the legal documents, you
6 refused to accept them. I explained to you telephonically that they were
7 legal documents and we needed to provide them to you. We can plan, but
8 it seems you are evading service. If you could be so kind as to meet our
9 firm, we can serve you via email. We want to assure you of our
10 commitment to serving you. We are striving to reach an understanding
11 after we have explained the service of the legal documents to you. Please
12 call us back at your earliest convenience. Thank you.

13 Documents Summons and Complaint / Acknowledgment Enabled

14 Email Receipt Status / Waiting for Kai Fan to click digital service link.

15 Acknowledgment Status /Waiting for Kai Fan to sign Acknowledgment &
16 Waiver.

17 Documents Download Status

18 Waiting for Kai Fan to download documents. All Activity

19 6/16/25, 3:13 pm Digital Service Created Sent to kevin520@gmail.com

20 6) Tuesday, June 17, 2025, 8:30 a.m. (weekday attempt)

21 a. All the vehicles are parked at the home; they have security cameras in the
22 front that face anyone approaching the residence. I door-knocked for ten
23 minutes and used a bodycam to capture the events. They are evading
24 service.

25 7. We were given a secondary address of 3426 Vineland Avenue, Baldwin Park, CA.

26 Below are the listed dates and times when we made attempts to serve the legal
27 documents:

28 1) Friday, June 20, 2025, at 8:15 p.m. (weekday attempt)

1 a. The location is secure and locked; there is no way to access the front door
2 or enter the property. Also, a camera in front

3 2) Sunday June 22, 2025, at 11:00 a.m. (weekend attempt)

4 a. All the gates are locked and closed, making it impossible to gain access to
5 the property due to the security gates. We cannot knock on the front door.
6 There is a vehicle parked behind security gates, and uploaded photos.

7 3) Saturday, June 28, 2025, at 4:55 p.m. (weekend attempt)

8 a. The vehicle, trash cans, and all gates are the same. No change.

9 8. Additionally, I created a door hanger memo with the following information and
10 emailed it to Mr. Fai, then posted it on the front door in Rancho Cucamonga. I was
11 unable to post at the Baldwin Park location because I was unable to gain access to
12 the property due to their security gate.

13 Door Hanger Created on Monday, 06-16-2025, 2:50 p.m.

14 Created for Kai Fan, Tracking Number SSTG49;

15 “Mr. Fan, we have made several attempts to visit your residence, spoken to
16 your daughter, and provided you with our business card. You returned the
17 call. However, when we tried to serve the legal documents, you refused to
18 accept them. I explained to you telephonically that they were legal
19 documents and we needed to provide them to you. We can plan, but it seems
20 you are evading service. If you could be so kind as to meet our firm, we can
21 serve you via email. We want to assure you of our commitment to serving
22 you. We are striving to reach an understanding after we have explained the
23 service of the legal documents to you. Please call us back at your earliest
24 convenience. Thank you.”

25 9. On Monday, June 9, 2025, at 10:20 a.m., I conducted a SKIP Trace and discovered
26 that Xiaonan Li is the wife of Kai Fan. She is a Real Estate Broker, and her license
27 is registered at the same address as Mr. Kai Fan. A business is registered at the
28 same address as LIMA FUTURE LLC. (B20250066294).

1 10. I have exhausted all the tools in the trade to trace and serve Mr. Fan. Mr. Fan did
2 call me and acknowledge that it was he, and he asked many questions about the
3 legal documents. I explained to him the importance of the papers and mentioned
4 that I could meet him at any place to complete the service. He stated he does not
5 have time and hung up. It is evident and apparent that Mr. Fan understood I had
6 legal documents and evaded service after I explained to him.

7
8 Dated this 26th of August 2025.

9
10
11 

12 William Sera, RPS No. 2016163195
13 Registered Process Server
14 Los Angeles County
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